

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF PUERTO RICO
OLD SAN JUAN DIVISION**

IN RE:

CASE NO.: 17-03666-MCF13

LYDIA ORTIZ ORTIZ,

CHAPTER 13

Debtor,

11 USC 362 d(1) d(2)

Relief from stay for cause

MOTION REQUESTING CONTINUANCE OF HEARING

TO THE HONORABLE COURT:

COMES NOW secured creditor Reverse Mortgage Funding LLC, hereinafter referred to as (**Movant**), through the undersigned counsel and very respectfully states, alleges and prays as follows:

1. That Movant filed a Motion for Relief from Stay under 362 [e] at docket #41.
2. That this Honorable Court scheduled a Hearing for said motion on 5/12/2020 at 01:30 PM.
3. That the Undersigned respectfully request a continuance of the Hearing in order to allowed the parties additional time to reach an agreement.
4. That Movants waives the 30 day determination period.

WHEREFORE, Secured Creditor, prays this Honorable Court enter an order continuing the Hearing scheduled for May 11, 2020.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on 11th day of May, 2020, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, and a true and correct copy has been served via CM/ECF to all participants.

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